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SUSAN Y. SOONG
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NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIMBERLY E. HUGHES,

Defendant.

Case No. 3:18-cv-5931-JCS

FINAL TRIAL EXHIBIT LIST

Bench Trial (Zoom): June 8, 2021, June 9,
2021 and June 10, 2021 at 8:00am to 2:00pm

The United States of America hereby submits the following trial exhibit list, updated to include exhibits submitted by Defendant Timberly Hughes (Exhibit No. 101 to 124).

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
[1]			[Intentionally not used to match deposition numbering]			
2	ANZ-0000045	ANZ-0000046	Emails from Hughes to Grant Dickson, Feb. 16-18, 2009	6/8/2021	6/8/2021	
3	ANZ-0000015	ANZ-0000015	Email from Grant Dickson to thughes@sprynet.com, June 29, 2009	6/8/2021	6/8/2021	
4	ANZ-0000080	ANZ-0000080	ANZ Bank Signature Card, Takamatua Valley Vineyards	6/8/2021	6/8/2021	
[5]			[Intentionally not used to match deposition numbering]			
6	ANZ-0000081	ANZ-0000081	Passports submitted to ANZ Bank	6/8/2021	6/8/2021	

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
7	ANZ-0000082	ANZ-0000086	Takamatua Valley Vineyards Limited Business Registration Listing	6/8/2021	6/8/2021	
8	ANZ-0000074	ANZ-0000079	Email from Sandhya Singh to T. Hughes re: loan statements, Jan. 30, 2013	6/8/2021	6/8/2021	
9	HUGHES_PR OD-000113	HUGHES_PR OD-000113	Final Loan Account Statement Loan No. X1003, Oct 2010 to March 2011	6/8/2021	6/8/2021	
10	ANZ-0000075	ANZ-0000201	Statement of Accounts Account No. X4400	6/8/2021	6/8/2021	
11	ANZ-0000203	ANZ-0000377	Statement of Accounts Account No. X0600	6/8/2021	6/8/2021	
12	ANZ-0000378	ANZ-0000485	Statement of Accounts Account No. X0625	6/8/2021	6/8/2021	
13	ANZ-0000486	ANZ-0000532	Term Deposit Account Statements -1000, -1004, -1005, -1006	6/8/2021	6/8/2021	
14	HUGHES_PR OD-000016	HUGHES_PR OD-000112	Hughes Form 1040s 2010 through 2013	6/8/2021	6/8/2021	
15	HUGHES_PR OD-000001	HUGHES_PR OD-000015	Hughes Response to U.S. 1st Set of Requests for Admissions, Requests for Production and Interrogatories	6/8/2021	6/8/2021	
16	USA-001047	USA-001070	Blank FBAR Forms and Schedule Bs to Form 1040, 2010-2013 with Instructions	6/8/2021	6/8/2021	
17	USA-000006	USA-000009	Form 13448 for years 2010, 2011, 2012, and 2013	6/8/2021	6/8/2021	
18	USA-000010	USA-000011	Letter from IRS to Hughes re Appeal results, Sept. 28, 2016	6/8/2021	6/8/2021	
19	USA-000032	USA-000034	Letter from IRS to Hughes re proposed assessment, Oct. 16, 2015	6/8/2021	6/8/2021	
20	USA-000068	USA-000069	Takamatua Valley Vineyards Limited Incorporation Docs	6/8/2021	6/8/2021	
21	USA-000070	USA-000071	Cuba Uncorked incorporation documents	6/8/2021	6/8/2021	
22	USA-000120	USA-000131	2010 Hughes 1040 (Electronic Transcript)	6/8/2021	6/8/2021	
23	USA-000132	USA-000160	2011 Hughes 1040 (Signed IRS Copy)	6/8/2021	6/8/2021	
24	USA-000161	USA-000184	2012 Hughes 1040 (Signed IRS Copy)	6/8/2021	6/8/2021	
25	USA-000185	USA-000207	2013 Hughes 1040 (Signed IRS Copy)	6/8/2021	6/8/2021	

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
26	USA-000251	USA-000255	Revenue Agent Lauren's Notes of 8/15/2014 Interview of T. Hughes	6/8/2021	6/8/2021	
27	USA-000264	USA-000264	Civil Penalty Approval Form 2010-2013	6/8/2021	6/8/2021	
28	USA-000277	USA-000639	ANZ Bank Records provided by T. Hughes to IRS during FBAR audit	6/8/2021	6/8/2021	
29	USA-000710	USA-000710	Email from Hughes to S. Katz re Fincen Acknowledgement of FBAR Electronic Filing	6/8/2021	6/8/2021	
30	USA-000719	USA-000720	Letter from J. Lauren to T. Hughes re FBAR examination with information document request, Jan. 15, 2015	6/8/2021	6/8/2021	
31	USA-000724	USA-000727	Email from T. Hughes to J. Lauren re FBAR submissions for 2011-2013, Sept. 22, 2014	6/8/2021	6/8/2021	
32	USA-000728	USA-000729	Letter from T. Hughes to J. Lauren dated 8/26/2014	6/8/2021	6/8/2021	
33	USA-000730	USA-000735	Hughes FBARs 2011 (Handwritten)	6/8/2021	6/8/2021	
34	USA-000743	USA-000748	Hughes FBARs 2012 (Handwritten)	6/8/2021	6/8/2021	
35	USA-000756	USA-000762	Hughes FBARs 2013 (Handwritten)	6/8/2021	6/8/2021	
36	USA-000771	USA-000776	Email chain between J. Lauren and T. Hughes re FBAR forms Aug. 25, 2014	6/8/2021	6/8/2021	
37	USA-000082	USA-000118	FinCen Transcripts (Electronic Filing Confirmations for FBARs)	6/8/2021	6/8/2021	
38	USA-000836	USA-000836	Information Document Request August 21, 2014	6/8/2021	6/8/2021	
39	USA-000837	USA-000837	Information Document Request January 1, 2015	6/8/2021	6/8/2021	
40	USA-000838	USA-000838	Information Document Request March 12, 2015	6/8/2021	6/8/2021	
41	USA-000846	USA-001046	U.S. Tax Court Pleadings and Stipulated Order Nov. 2, 2018	6/8/2021	6/8/2021	
42	USA-001071	USA-001077	Certification of Outstanding Balance, Forms 13448 Penalty Assessment Certification	6/8/2021	6/8/2021	
43	USA-001078	USA-001082	Letter 3708 - Notice of Assessment & Demand for Payment	6/8/2021	6/8/2021	

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
44	USA-000641	USA-000696	Pre-Assessment FBAR Penalty Notification Letter dated 10/16/2015 with IRS Form 886A (Explanation of Items)	6/8/2021	6/8/2021	
45	ANZ-000627	ANZ-000641	Facility Agreement dated 21 April 2012 with Surety Acknowledgement	6/8/2021	6/8/2021	
46	ANZ-0000642	ANZ-0000646	Variation Letter – TVV Loan April 3, 2013 with Surety Acknowledgment	6/8/2021	6/8/2021	
47			TurboTax 2010 Software (CD - .exe file)	6/8/2021	6/8/2021	
48			TurboTax 2011 Software (CD - .exe file)	6/8/2021	6/8/2021	
49			TurboTax 2012 Software (CD - .exe file)	6/8/2021	6/8/2021	
50			TurboTax 2013 Software (CD - .exe file)	6/8/2021	6/8/2021	
51			Summary Exhibit of TurboTax 2010 Software prompts relating to Schedule B and FBAR			
52			Summary Exhibit of TurboTax 2011 Software prompts relating to Schedule B and FBAR			
53			Summary Exhibit of TurboTax 2012 Software prompts relating to Schedule B and FBAR			
54			Summary Exhibit of TurboTax 2013 Software prompts relating to Schedule B and FBAR			
55			T. Hughes Deposition Transcript 12/16/20 (for identification purposes)			
56			T. Hughes Deposition Transcript 1/28/21 (for identification purposes)			
57			Intuit Business Records Declaration (Lisa Skelly)			
58			ANZ Business Records Declaration	6/8/2021	6/8/2021	
59			IRS Business Records Declaration	6/8/2021	6/8/2021	
[end]			[Intentionally blank - end of Plaintiff's Exhibits]			
101		Exh. A, 130-1, p.2	Letter dated 29 Oct 2015 from Alan Bruce to Timberly Hughes	6/8/2021	6/8/2021	

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
102		Exh. A, 130-1, p.3	Letter dated 9 Nov 2015 from DWP McCone to T Hughes	6/8/2021	6/8/2021	
103		Exh. A, 130-1, p.4	Letter dated 19 Apr 2001 from Inland Revenue to Takamatua	6/8/2021	6/8/2021	
104		Exh. A, 130-1, p. 5	Letter dated 29 Sep 2002 from Inland Revenue to Takamatua	6/8/2021	6/8/2021	
105		Exh. A, 130-1, p. 6	Letter dated 05 Oct 2002 from Inland Revenue to Takamatua	6/8/2021	6/8/2021	
106		Exh. A, 130-1, p. 7	Email from T. Hughes to S. Katz dated 3/31/2018	6/8/2021	6/8/2021	
107		Exh. A, 130-1, p.8	Email from T. Hughes to S. Katz dated 3/31/2018	6/8/2021	6/8/2021	
108		Exh. A, 130-1, p.p. 9-14	Media Release 11 Feb 2005 NZ Inland Revenue	6/8/2021	6/8/2021	
109		Exh. A, 130-1, p.p. 15-16	Letter from Inland Revenue to Timberly Hughes dated 16-Jan-2015	6/8/2021	6/8/2021	
110		Exh. B, 130-2, p.p. 1-3	Letter from T. Hughes to J. Lauren dated Aug. 26, 2014	6/8/2021	6/8/2021	
111		Exh. C, 130-3	FinCEN FBAR filing confirmations dated 9/23/2014	6/8/2021	6/8/2021	
112		Exh. D, 130-4	Protest Letter from Steven Katz to RA Jonathan Lauren	6/8/2021	6/8/2021	
113		Exh. E, 130-5	ANZ Bank Statements, and Correspondence	6/8/2021	6/8/2021	
114		Exh. F, 130-6	Gonzaga University Transcript	6/8/2021	6/8/2021	
115		Exh. G, 130-7	Email from Jiro Ishikawa at Seiler to Timberly Hughes re CNR Inc	6/8/2021	6/8/2021	
116		Exh. H, 130-8	Michael Gibbons online obituary	6/8/2021	6/8/2021	
117		Exh. I, 130-9	Tax Court Docket No. 15230-17, Decision dated Nov 2, 2018	6/8/2021	6/8/2021	
118		Exh. J	Intuit Turbo Tax Forms Mode Summaries	6/8/2021	6/8/2021	
119	USA - 0326-0338	Exh. K	National Bank Term Deposit #1000	6/8/2021	6/8/2021	
120	USA-0305-0311	Exh. K	National Bank Term Deposit #1004	6/8/2021	6/8/2021	
121	USA-0293-0301	Exh. K	National Bank Term Deposit #1005	6/8/2021	6/8/2021	

EXH. NO.	BATES BEG.	BATES END	Description	Offered	Received	Limitations
122	USA-0285-0290	Exh. K	National Bank Term Deposit #1006	6/8/2021	6/8/2021	
123	USA-0728-0729	Exh. K	Letter from T. Hughes to J. Lauren dated 8/26/2014	6/8/2021	6/8/2021	
124		Exh. K	Spreadsheet on Tax Paid/Summary on Balances	6/8/2021	6/8/2021	

DATED this 28th day of May, 2021.

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Acting Assistant Attorney General

/s/ Nithya Senra
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May, 2021, I electronically filed the foregoing Objections, with the Clerk of Court using the CM/ECF system, which has served the following CM/ECF participants:

Timberly E. Hughes, thughes@sprynet.com, Defendant, *pro se*.

/s/ Nithya Senra
NITHYA SENRA
Trial Attorney, Tax Division
U.S. Department of Justice